

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**CARLOS A. GARCIA-PEREZ,  
et al.,**

Plaintiffs,

v.

**ALVARO SANTAELLA, MD, et al.,**

Defendants.

Civil No. 97-1703 (JAG)

**PLAINTIFFS' INFORMATIVE MOTION UNDER SEAL**

TO THE HONORABLE COURT:

COME NOW the plaintiffs, through the undersigned attorneys, and respectfully request and pray as follows:

1. Dated May 31, 2005, the parties in the case of reference signed a Confidential Settlement Agreement and Release of All Claims (“settlement agreement”), which disposed of plaintiffs’ causes of action against defendants.

2. As part of the aforementioned settlement agreement, on this same date plaintiffs have already filed through the ECF/CM system a separate Joint Stipulation for Voluntary Dismissal of All Claims With Prejudice their causes of action against defendants as well as the cross-claims and counterclaims.

3. Pursuant to the settlement agreement, defendants will deposit the settlement amount before the Clerk’s Office of this Honorable Court, and plaintiffs will then file a Motion

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Requesting the Withdrawal of the Funds.

4. Attached herein as Exhibit 1 is the Verified Statement Under Penalty of Perjury Pursuant to 28 U.S.C. 1746, signed by the parents of minor plaintiff Carla Isabel García-Baerga regarding their approval of the settlement on behalf of their minor daughter pursuant to the Local Rules of this Court.

WHEREFORE, plaintiffs respectfully request that this Honorable Court take note of the above.

Respectfully submitted.

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of June, 2005.

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Pedro J. Córdova, Esq., P.O. Box 9023998, San Juan, Puerto Rico 00902-3998; Angel R. de Corral-Juliá, Esq., De Corral & De Mier, 130 Eleonor Roosevelt, San Juan, Puerto Rico 00918-3105; Marta E. Vilá-Báez, Esq., Sánchez, Betances & Sifre, P.O. Box 195055, San Juan, Puerto Rico 00919-5055; Roberto Ruiz-Comas, Esq., González Pando Plaza, 1181 Jesús T. Piñeiro Avenue, San Juan, Puerto Rico 00920-5604; José Enrique Otero, Esq., P.O. Box 9023933, San Juan, Puerto Rico 00902-3933; José Héctor Vivas, Esq., Vivas & Vivas, P.O. Box 330951, Ponce, Puerto Rico 00733-0951; Igor J. Domínguez, Esq., 652 Muñoz Rivera Avenue, Suite 3125, Hato Rey, Puerto Rico 00918-4261; Doris Quiñones-Tridas, Esq., 1413 Fernández Juncos, Box 3, San Juan, Puerto Rico 00909; Pedro Toledo-González, Esq., Julio Bogoricin Building, Office L-06, Lobby, 1606 Ponce de León Avenue, Santurce, Puerto Rico 00909; Gilda del C. Cruz Martino, Esq., P.O. Box 9023875, San Juan, Puerto Rico 00902-3875; Jeannette López de Victoria, Esq., Isabel Guillén Bermúdez, Esq., Pinto Lugo, Oliveras & Ortiz, P.O. Box 9024098, San Juan, Puerto Rico 00902-4098.

s/ Andrés Guillemard-Noble

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